

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>JASON DOUGLAS, individually and on</b>	)	
<b>behalf of all others similarly situated,</b>	)	<b>Case No. 1:14-cv-01741</b>
	)	
	<b>Plaintiff,</b>	<b>Judge Gary Feinerman</b>
<b>v.</b>	)	
	)	
<b>THE WESTERN UNION COMPANY, a</b>	)	
<b>Delaware corporation,</b>	)	
<b>Defendant.</b>	)	

**THE WESTERN UNION COMPANY’S SUBMISSION  
IN ACCORDANCE WITH THE COURT’S MAY 25, 2016 ORDER**

In accordance with the Court’s May 25, 2016 Order, The Western Union Company (“Western Union”) submits the following memorandum regarding the time spent by Western Union’s in-house counsel in this action:

1. Western Union’s in-house counsel do not keep records regarding the time they spend on specific matters and did not do so for this case.
2. As such, Western Union cannot determine with precision or provide to the Court the total number of hours that it has spent defending this case.
3. In an effort to provide some response to the Court’s inquiry, however, the billing statements of Western Union’s outside counsel, Latham & Watkins LLP (“Latham”), were reviewed to estimate the number of hours Western Union’s in-house counsel spent conferring with attorneys at Latham as well as the number of hours that Western Union’s in-house counsel spent in mediation sessions that led to the proposed settlement.
4. Based on Latham’s billing statements from April of 2014 to April of 2016, Western Union’s in-house counsel spent approximately 90 hours conferring with attorneys at Latham and participating in mediation sessions that led to the proposed settlement.

5. The estimation in Paragraph 4 above, however, does not account for time that Western Union's in-house counsel spent (a) reviewing and revising pleadings and other papers, (b) preparing for mediation and (c) investigating the facts after the Complaint was served. The time spent on these matters is unknown, and Western Union does not believe the time can be accurately estimated.

Dated: June 3, 2016

Respectfully submitted,

/s/ Kathleen P. Lally

One of the Attorneys for Defendant  
The Western Union Company

Mark S. Mester  
mark.mester@lw.com  
Kathleen P. Lally  
kathleen.lally@lw.com  
LATHAM & WATKINS LLP  
330 North Wabash Avenue, Suite 2800  
Chicago, Illinois 60611  
Telephone: (312) 876-7700  
Facsimile: (312) 993-9767